



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

SEP 24 2002

Mr. Ron Coleman  
Gebauer Company  
9410 St. Catherine Avenue  
Cleveland, Ohio 44104

Ref. No. 02-0143

Dear Mr. Coleman:

This responds to your letter regarding aerosols packaged and offered for international transportation under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). You state in your letter that under the International Civil Aviation Organization's Technical Instructions for the Safe Transport of Dangerous Goods by Air (ICAO Technical Instructions) the use of metal receptacles described as "IP.7, IP.7A, and IP.7B" are required for aerosols. You inquire whether your product, a non-hazardous medical solution, may be offered for transport internationally by air when packaged in DOT Specification 2Q aerosol containers and overpacked in non-UN standard outer packaging.

The answer is yes. Under the ICAO Technical Instructions, the use of an IP.7, IP.7A, or IP.7B receptacle is not required for an aerosol with a pressure below 970 kPa. Also, under the HMR, a specification aerosol container, such as a DOT 2P or 2Q, is not required for an aerosol with a pressure below 140 psig (965.3 kPa) at 130 °F (54 °C) but may be used. In addition, non-UN standard outer packaging meeting the general requirements of §§ 173.24 and 173.24a of the HMR would satisfy the requirements of the ICAO Technical Instructions under Packing Instruction Y203 (limited quantity) or Packing Instruction 910 (consumer commodity).

I trust this satisfies your inquiry. Please contact us if we can be of further assistance.

Sincerely,

Hattie L. Mitchell  
Chief, Regulatory Review and Reinvention  
Office of Hazardous Materials Standards



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171.11



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Stevens

\$171.11

\$173.306

ICAO

02-0143

April 29, 2002

Mr. Edward T. Mazzullo, Director  
Office of Hazmat Standards, RSPA  
US Department of Transportation  
400 7<sup>th</sup> Street, S. W.  
Washington, D. C. 20590-0001

Subject: Interpretation of Packaging Requirements to Ship Overseas by Air

Reference: Salivart Product Sheet  
Salivart MSDS

Dear Mr. Mazzullo,

Gebauer Company would like an interpretation of CFR49 and ICAO packaging requirements to ship our product, Salivart, overseas by air in a non-UN performance tested box. We will identify our product as "Aerosol, non-flammable, UN1950". Salivart is a synthetic saliva sold in a 2Q aluminum aerosol can pressurized by nitrogen.

Ms. Helen Engrum, from the Hazardous Materials Information Center, helped identify packaging instructions Y203 referring to IP.7 metal receptacles. Ms. Cheryl Freeman, from the Office of Haz. Mat. Technology, RSPA, provided a definition of the IP.7 receptacles. After working with our engineering department and our aerosol can manufacturer, EXAL Corp., I can state that our aerosol can exceeds all pressure and wall thickness requirements for IP.7, IP.7a and IP.7b receptacles. After review of the following specifications please advise if our product qualifies to be shipped overseas by air in a non-UN performance tested box.

The following specifications are for Salivart:

- 1 Container - EXAL Corp 38 mm x 119 mm DOT-2Q round shoulder aluminum aerosol can
- 2 Contents - 2.48 fl. oz. electrolyte solution (water)
- 3 Propellant - Nitrogen - 120 psi maximum at filling.  
910 kPa @ 55C
- 4 Packaged with an overcap in a unit carton with 12 units per shipping box.



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If you have any further questions concerning the specifications or how we intend to ship our product please contact me on Extension 21. Thank you.

Sincerely,

Ron Coleman

Director of Materials Management

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